

15 May 1984

U.S. Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Attention: Mr. Stephen Busch
Waste Management Branch

Reference: EPA ID No. MOD000818963 - RCRA PERMIT

Enclosure: (1) Part "B" Page C-18 1 and 2 of 2 (6 copies)
(2) Part "B" Pages C-42, C-43, C-44, and C-45 through C-60 (6 copies)
(3) Part "B" Pages G-3, G-4, G-6, G-11, G-30, G-37, G-38, G-41, G-44, G-47, G-57, G-60, and G-61 (6 copies)

REGISTERED MAIL - RETURN RECEIPT

Dear Mr. Busch:

We have reviewed the Public Notice, Draft Permit, and Fact Sheet concerning our referenced facility.

In our review of the attachments to the Draft Permit, we discovered that minor changes have occurred. These changes are as follows:

- a) "Environmental Pollution Control" is changed to "Environmental Compliance";
- b) All departments having a 100-series number (191C, etc.) have been changed to an 800-series number (891C);
- c) Several people have retired or changed job titles, or have changed telephone numbers. These have all been changed to the current status.
- d) Six new Missouri Waste Streams have been added.

All of the above changes do not affect any of our operations as previously detailed in our Part "B" filing.

We are supplying these revisions so that our permit attachments will reflect the current information at the time of issuance.

If you have any questions, please contact us.

Sincerely,

MCDONNELL AIRCRAFT COMPANY

J. C. Patterson

J. C. Patterson, Section Manager
Environmental Compliance
Dept. 891C, Bldg. 305, L-4W
(314) 233-9824

JCP:bem

EC: Mr. Joe Jansen
Waste Management Program, Missouri Dept. of Natural Resources
(letter with copies of all enclosures)



R00148149
RCRA RECORDS CENTER

EPA-ARWM/PMTS

MAY 21 1984

Region VII K.C., MO

MCDONNELL DOUGLAS



TABLE C-1

MO ID NO.	HAZARDOUS WASTE	HAZARDOUS PARAMETER	RATIONALE	DOT PROPER SHIPPING NAME	DOT ID NUMBER
086	Metal treating solution in tooling manufacturing	pH	This solution is a Hazardous Waste due to Corrosivity (D002).	Waste Sodium Hydroxide Solution	UN1824
088	Scale conditioner for exotic scales on metals	pH; Reactivity (CN)	This solution is a Hazardous Waste due to Corrosivity (D002, D003).	Hazardous Waste, Solid, N.O.S.	NA9189
091	Miscellaneous acid sludges	pH; EP Toxicity (Cd, Cr ⁺⁶)	This sludge is Hazardous Waste due to Corrosivity (D002) and EP Toxicity (D007 and D008).	Waste Corrosive Solids, N.O.S.	UN1759
092	Miscellaneous alkaline sludges	pH; EP Toxicity; Reactivity (CN)	This sludge is Hazardous Waste due to Corrosivity (D002), EP Toxicity (D007, D008), and Reactivity (D003).	Waste Corrosive Solids, N.O.S.	UN1759
R-2 002	Laboratory scale plating bath	pH; Reactivity (CN)	This solution is a Hazardous Waste due to Corrosivity (D002, D003).	Hazardous Waste, Liquid, N.O.S.	NA9189
004	Waste acid and rinse water from metal cleaning	pH	This solution is a Hazardous Waste due to Corrosivity (D002).	Waste Corrosive Liquid, N.O.S.	UN1760
005	Excess paint removed from part racks	pH; EP Toxicity (Cr ⁺⁶ , Cd)	This solution is a Hazardous Waste due to EP Toxicity (D006, D007) and Corrosivity (D002).	Waste Corrosive Liquid, N.O.S.	UN1760
007	Laboratory spray operations	pH; EP Toxicity (Cd)	This solution is a Hazardous Waste due to Corrosivity (D002) and EP Toxicity (D006).	Waste Corrosive Liquid, N.O.S.	UN1760

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011	Laboratory reversal solution from photoetching	EP Toxicity (Cd)	This solution is a Hazardous Waste due to EP Toxicity (D006).	Hazardous Waste, Liquid, N.O.S.	NA9189
015	Laboratory scale indium plating solution	EP Toxicity (Hg); Reactivity (Cyanide)	This solution is a Hazardous Waste due to EP Toxicity (D009) and Reactivity (D003).	Hazardous Waste, Liquid, N.O.S.	NA9189

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METHODS USED TO SAMPLE HAZARDOUS WASTES
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2. (G-2) Emergency Coordinators

* (314) 233-9824 - Section Manager, Environmental Compliance R-1
(Primary Coordinator)

R-1

* (314) 232-2370 - Manager, Plant Design and Maintenance Engineering

* (314) 234-7058 - Director, Plant Engineering R-1

(314) 232-2821 - Plant Engineering Duty Officer

(314) 232-2821 - Corporate Duty Officer

Note: See Attachment I for corresponding names and home
phone numbers.

(* = 8:00 a.m. to 4:30 p.m. normal work days)

(# = All other times)

3. Emergency Equipment

MDC-St. Louis has its own Fire Services, which consists of at least eight firemen and one officer on duty at any given time. Fire Services equipment consists of: four Class A structural pumpers; two crash trucks with 2,000 gallons of water and 110 gallons of foam; two trucks with 1,000 lbs. of dry chemicals on each unit; one utility van; one car; two pickup trucks; and a trailer with 20 bags of oil-absorbent material. MDC-St. Louis has a "Pre-Fire Plan" (see Figure F-2 Section F) that defines the specifics of what is stored at this facility, where fire hydrants are located, what action is to be taken by firemen and guards in the event of a fire, and what backup community fire departments are to be called if necessary.

ATTACHMENT I
EMERGENCY COORDINATORS

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off Duty Telephone No.</u>	
1.	Section Manager, Dept. 891C Environmental Compliance	J. C. Patterson	(314) 567-1336	R-1
				R-1
2.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1
3.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1

6. Environmental Compliance

Environmental Compliance, a section of Plant Engineering, implements environmental procedures at the plant. In the event of a pollution emergency, a representative of this group monitors the emergency site and provides assistance and direction for controlling the emergency and cleaning up the area. Environmental Compliance is also responsible for notifying the National Response Center (800-424-8802) if the situation requires such action. R-2 R-2

7. Duties of Emergency Coordinator

In the event of a pollution emergency, the first person discovering the emergency shall notify the Fire Services at inplant telephone number 22611 and the Guard Services Headquarters at inplant telephone number 22821. They will in turn notify an emergency coordinator, starting at the top of the list and working down. The first person contacted shall be the emergency coordinator for that particular situation and shall act as an "on-site coordinator" and shall remain there until the situation is over. Evacuating and cordoning the area is the responsibility of Security Services. The MDC-St. Louis Fire Chief shall decide if assistance is required from a local fire department.

E. (G-3) Implementation of the Contingency Plan

1. The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the emergency coordinator in making this decision by providing decision-making criteria.

4. Possible sources of ignition have been eliminated in areas where flammable materials are stored. Vehicular traffic in the area will be controlled until the spill is contained and safety is restored. If spilled materials are flammable, the Fire Services will respond with foam equipment and hoses. Flushing with large quantities of water or foaming of the spill will be performed only if advised by a Fire Services officer.
5. If a highly flammable material is released (e.g. propane or natural gas), a decision, based on volume, immediate danger, and impending explosion, will be made concerning notifying or evacuating personnel in the surrounding area. Use of motor vehicles within this area will be restricted or eliminated to avoid ignition of the vapor, which can cause a flashback to the source and an initial explosion of fire of wide dimensions.
6. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The Fire Services officer will determine when the emergency has passed and consult with the emergency coordinator before the "all clear" signal is given.

H. Spills or Material Release

1. In the event of a major emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation. If the spill is a flammable material, notify the Fire Services. Report all other spills to Environmental Compliance, Phone 23319, between 8 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, Monday through Friday, and all shifts Saturday, Sunday, and holidays, phone the MDC-St. Louis Telephone Operator and report the nature of the emergency.

R-1

SECTION II
INSOLUBLE (FLOATING) MATERIAL

A. PURPOSE

McDonnell Douglas Corporation - St. Louis is an aerospace manufacturer with office and manufacturing buildings adjacent to the Lambert-St. Louis International Airport in St. Louis, Missouri. Because a number of storm water outfalls lead from MDC property to Coldwater Creek, a real possibility exists for an accidental discharge of oil from MDC facilities to navigable water. Therefore, the purpose of this SPCC plan is to prevent, reduce, or eliminate pollution to the environment from MDC facilities through a program of preparedness and prevention. This is accomplished through engineered spill prevention and detection, providing material, equipment, and manpower to contain and recover an accidental spill or discharge and an employee awareness program through training. This SPCC is required by the Code of Federal Regulations, Title 40, Sub Part D, Part 112, and 40 CFR 264, Sub Part D.

B. SCOPE

1. Plant Engineering Maintenance and the Environmental Compliance Section have primary responsibility for containment and recovery of a discharge.
2. The divisional companies included in this procedure are as follows:

2.1 McDonnell Aircraft Company (MCAIR)

Lambert-St. Louis International Airport

Banshee Road

St. Louis, Missouri

R-1

D. 1. 1.5 (Continued)

every three (3) years from the date such facility becomes subject to these sections.

1.6 Section 112.6 Civil Penalties

Owners or operators of facilities subject to Section 112.3 (a), (b), (c), who violate the requirements of these sections by failing or refusing to comply with any of the provisions shall be liable for a civil penalty of not more than \$5,000 for each day that such violation continues. No penalty shall be assessed until the owner or operator has been given notice and an opportunity for hearing.

E. GENERAL

1. McDonnell Douglas Corporation - St. Louis Environmental Pollution Control Program

- 1.1 The Environmental Compliance section is assigned the responsibility of conducting "all liaison between MDC-St. Louis and the various regulatory bodies, including reporting spills to the National Response Center". R-1
- 1.2 Spills are reported to Environmental Compliance by calling 232-3319 between 8:00 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, weekends, and holidays, call the MDC telephone operator. The message will be relayed via telephone or Pocket Pager System. R-1

F. MCAIR OIL SPILL PREVENTION PLAN

1. Fuel Oil Storage - All above-ground tanks in excess of 300 gallons, except the 9,000-gallon Coaliquid fuel tank at Bldg. 5, are provided with concrete wall or diked enclosures to contain any losses. All underground tanks in excess of 500 gallons (except for emergency generator tanks at Bldg. 106 - 1,500 gal., Bldg. 107 - 4,000 gal.) are checked monthly.
Note: Coaliquid is a mixture of 50% pulverized coal, 40% No. 6 fuel oil, and 10% water. Due to its high viscosity, spill liability is low!
2. Gasoline Storage - All above-ground tanks do not have any spill containment enclosures. The maximum size tank in this service is 500 gallons. All underground tanks (except for emergency generator tank at Bldg. 2 - 1,000 gallons) are checked monthly.
3. Jet Fuel (JP-4) - All stationary tanks (non-trailers) are located underground.
4. Solvents - Bulk solvent storage is maintained in underground tanks.
5. Cutting Oils - A total of nine tanks having a total capacity of 23,000 gallons are located in Bldg. 27 "Anodize" basement. The sewer in this basement area is connected to the Bldg. 14 Industrial Waste Water Treatment Plant; therefore, no losses can escape to open streams.

G. OPERATIONAL RESPONSIBILITIES

Oil Spill Countermeasure Plan

1. Tract I - North - Dept. 892A Maintenance Superintendent Responsibility R-1
Identification - Oil spilled into any storm sewer drainage system in Tract I - North will flow from the McDonnell property of NPDES Outfall 001. This outfall is located on the north side of McDonnell Blvd., east of the entrance to Owens-Corning Company. The McDonnell effluent comes from underneath McDonnell Blvd.

G. 1. 1.4

1.4b If it has been MORE than two hours since oil was discharged at NPDES Outfall 001, take the Oil Spill Response Trailer to the intersection of Coldwater Creek and Highway I-270 south service road (9000 Pershall Road). Install the oil-absorbing media and begin oil collecting using floating skimmer as required.

NOTE: Under normal flow conditions, oil discharged from NPDES Outfall 001 will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

2. Tract I - South - Dept. 892B Maintenance Superintendent Responsibility

R-1

Identification - Oil spilled into storm sewer drainage systems in Tract I - South will flow from the McDonnell property of NPDES Outfalls 002, 003, or 004. Outfalls 002 and 004 enter Coldwater Creek underground. Access to Outfall 003 is gained by entering the electrical substation (Bldg. 8) and then going into the Bldg. 9 pump house. Outfall 003 is the outlet of the stream flowing through the bottom of Bldg. 9. Oil-absorbing media is stored in the cabinet located in the southeast corner of Bldg. 9 on the floor level that you enter (metal grate floor) and also in a box identified as "Emergency Oil Absorbing Boom" located in Parking Lot 3.

Action - The Maintenance supervision responsible for Tract I - South will, immediately upon receiving knowledge of any oil entering the storm sewers in Tract I - South, take the following sequence of steps.

2.1 Send Maintenance personnel to the "Emergency Oil Absorbing Media" storage box located in Bldg. 9 and install one (1) 10 ft. boom across at this location.

G. 2. 2.4 2.4b (Continued)

normal flow conditions, oil discharged into Coldwater Creek at Banshee Road will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

3. Tract II - Depts. 893A and 893B Maintenance Superintendent Responsibility

R-1

Identification - Oil spilled into any storm sewer drainage systems in Tract II will flow from McDonnell property at NPDES Outfalls 006, 007, 010, or 011. All of these outfalls ultimately discharge into a tributary of Coldwater Creek which flows north, parallel to Eva Avenue. The oil-absorbing media to be used for this area will be found in the Oil Spill Response Trailer located at Bldg. 14.

Action - The Maintenance supervision responsible for Tract II will, immediately upon receiving knowledge of any oil entering the storm sewer in Tract II, take the following steps.

3.1 Send Maintenance personnel to Bldg. 14, obtain the Oil Spill Response Trailer and tow the trailer to Tract II.

3.2 Determine which NPDES outfall the oil discharge is occurring and take the Oil Spill Response Trailer there.

R-1

3.3 Install oil-absorbing media to prevent oil from escaping McDonnell property.

3.4 If oil has already been discharged past these NPDES outfalls, then proceed with the Oil Spill Response Trailer to the intersection of Frost Avenue and Eva Avenue. Immediately east of Eva Avenue is a "ditch" that is common to all Tract II NPDES outfalls (plus non-McDonnell flows). If the oil has not yet reached this location, install the oil-absorbing booms and begin oil collection using the floating skimmer as required.

SECTION III

MDC-ST. LOUIS PLAN

"REPORTING SPILLS OF OIL AND HAZARDOUS MATERIALS"

SCOPE:

The following plan is established for the primary purpose of monitoring, investigating, and reporting spills of oil and hazardous materials, as they affect water pollution potential of storm sewer systems. Understandably, other items of concern would also be involved, such as safety and health conditions, fire protection, insurance, and maintenance. These areas are covered by separate established procedures and plans. Consequently, reference is made to these activities only for coordination purposes.

- A. Emergency Coordinator - The MDC-St. Louis Emergency Coordinator is the Section Manager, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 233-9824]. The coordinator has the overall responsibility for ensuring the performance of the activities specified in the "SCOPE." The alternate MDC-St. Louis Emergency Coordinator is the Waste Removal Coordinator, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 232-3319]. See Attachment III for a current list of names and home phone numbers of personnel filling these positions. R-1
- B. Surveillance and Monitoring Activities: R-1
1. Functional Operations - Environmental Compliance is directly responsible for functional operations. Environmental engineers and inspectors within this group periodically inspect operations and monitor potential upset conditions through a regular routine of sample collection and analysis. R-1

D. Internal Notification Procedures - The following MDC-St. Louis personnel will be notified as required for coordination purposes and/or possible corrective action, depending upon the nature of the upset condition.

	<u>Telephone Number</u> <u>(Normal Work Hours)</u>	
1. Crisis Management Coordinator Executive Officer Command Section U.S. Navy	Sta. 22731	
2. NAVPRO, CNO Sub-Area Coordinator Representative U.S. Navy	Sta. 22875	
3. Chief Property Management Branch U.S. Navy	Sta. 22459	
4. Safety Engineer U.S. Navy	Sta. 23444	
5. Manager, Dept. 064 Occupational Safety and Medical Services	Sta. 30436	R-1
6. Director, Dept. 890 Plant Engineering	Sta. 47058	R-1
7. Manager, Dept. 890 Plant Design and Maintenance Engineering	Sta. 22379	R-1
		R-1
		R-1

NOTE: See Attachment III for a current list of names and home phone numbers of the personnel filling these positions.

ATTACHMENT II

INTERNAL POLLUTION UPSET REPORTING PROCEDURE

(INSTRUCTIONS TO MDC-ST. LOUIS TELEPHONE OPERATORS)

1. In order to satisfy the requirements of the U.S. Department of Defense, MCAIR Management and the United States Environmental Protection Agency, we have instituted the following reporting system.
2. McDonnell telephone operators will continue to receive "Pollution Upset" reports between 4:30 p.m. and 8:00 a.m., Monday through Friday and during all shifts on Saturdays, Sundays, and holidays. Whenever a telephone operator receives a "Pollution Upset" report, the operator shall contact Environmental Compliance via the pocket pager. The pocket pager will be rotated among the Environmental Compliance staff. Whoever has the pocket pager should respond. The MDC telephone operator shall then wait 30 minutes. If no one responds to the pocket pager, begin calling the following personnel in sequence, starting at the top of the list, until you are able to reach one of them. If you are unable to reach anyone, wait 30 minutes and start the sequence over again, starting with the pocket pager. If no one has been contacted by the end of the shift, instruct the next shift to continue calling until contact is made.

J. C. Patterson	Home Phone - 567-1336	
P.E. Duty Officer	(Weekends and Holidays only)	

R. E. Bishop	Home Phone - 389-0467	
E. M. Myers	Home Phone - 432-2107	

3. The telephone operators shall record the "Pollution Upset" report in writing and orally relay them to the individual they are successful in contacting.

ATTACHMENT III

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off-Duty Telephone No.</u>	
1.	MDC-St. Louis Emergency Coordinator Dept. 891C	J. C. Patterson	(314) 567-1336	R-1
2.	Alternate MDC-St. Louis Emergency Coordinator Dept. 891C	R. J. Linzmaier	(314) 447-3080	R-1
3.	Crisis Management Coordinator Executive Officer Command Section	*W. H. Goesling (AA)	*(314) 232-0232 Ask to speak to "Air Force Duty Officer"	
4.	Safety Engineer	*J. Q. Harbison (SE)	"	
5.	NAVPRO CNO Sub-Area Coordinator Representative	*D. T. Smith (IN)	"	
6.	Chief Property Management Branch	*J. H. White (INX)	"	
7.	Manager, Dept. 064 Occupational Safety and Medical Services	R. L. Kuhn	None at this time	R-1
8.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1
9.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1

R-1

R-1

2. (G-2) Emergency Coordinators

* (314) 233-9824 - Section Manager, Environmental Compliance R-1
(Primary Coordinator)

R-1

* (314) 232-2370 - Manager, Plant Design and Maintenance Engineering

* (314) 234-7058 - Director, Plant Engineering R-1

(314) 232-2821 - Plant Engineering Duty Officer

(314) 232-2821 - Corporate Duty Officer

Note: See Attachment I for corresponding names and home
phone numbers.

(* = 8:00 a.m. to 4:30 p.m. normal work days)

(# = All other times)

3. Emergency Equipment

MDC-St. Louis has its own Fire Services, which consists of at least eight firemen and one officer on duty at any given time. Fire Services equipment consists of: four Class A structural pumpers; two crash trucks with 2,000 gallons of water and 110 gallons of foam; two trucks with 1,000 lbs. of dry chemicals on each unit; one utility van; one car; two pickup trucks; and a trailer with 20 bags of oil-absorbent material. MDC-St. Louis has a "Pre-Fire Plan" (see Figure F-2 Section F) that defines the specifics of what is stored at this facility, where fire hydrants are located, what action is to be taken by firemen and guards in the event of a fire, and what backup community fire departments are to be called if necessary.

ATTACHMENT I
EMERGENCY COORDINATORS

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off Duty Telephone No.</u>	
1.	Section Manager, Dept. 891C Environmental Compliance	J. C. Patterson	(314) 567-1336	R-1
				R-1
2.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1
3.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1

6. Environmental Compliance

Environmental Compliance, a section of Plant Engineering, implements environmental procedures at the plant. In the event of a pollution emergency, a representative of this group monitors the emergency site and provides assistance and direction for controlling the emergency and cleaning up the area. Environmental Compliance is also responsible for notifying the National Response Center (800-424-8802) if the situation requires such action. R-2 R-2

7. Duties of Emergency Coordinator

In the event of a pollution emergency, the first person discovering the emergency shall notify the Fire Services at inplant telephone number 22611 and the Guard Services Headquarters at inplant telephone number 22821. They will in turn notify an emergency coordinator, starting at the top of the list and working down. The first person contacted shall be the emergency coordinator for that particular situation and shall act as an "on-site coordinator" and shall remain there until the situation is over. Evacuating and cordoning the area is the responsibility of Security Services. The MDC-St. Louis Fire Chief shall decide if assistance is required from a local fire department.

E. (G-3) Implementation of the Contingency Plan

1. The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the emergency coordinator in making this decision by providing decision-making criteria.

4. Possible sources of ignition have been eliminated in areas where flammable materials are stored. Vehicular traffic in the area will be controlled until the spill is contained and safety is restored. If spilled materials are flammable, the Fire Services will respond with foam equipment and hoses. Flushing with large quantities of water or foaming of the spill will be performed only if advised by a Fire Services officer.
5. If a highly flammable material is released (e.g. propane or natural gas), a decision, based on volume, immediate danger, and impending explosion, will be made concerning notifying or evacuating personnel in the surrounding area. Use of motor vehicles within this area will be restricted or eliminated to avoid ignition of the vapor, which can cause a flashback to the source and an initial explosion of fire of wide dimensions.
6. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The Fire Services officer will determine when the emergency has passed and consult with the emergency coordinator before the "all clear" signal is given.

H. Spills or Material Release

1. In the event of a major emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation. If the spill is a flammable material, notify the Fire Services. Report all other spills to Environmental Compliance, Phone 23319, between 8 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, Monday through Friday, and all shifts Saturday, Sunday, and holidays, phone the MDC-St. Louis Telephone Operator and report the nature of the emergency.

R-1

SECTION II
INSOLUBLE (FLOATING) MATERIAL

A. PURPOSE

McDonnell Douglas Corporation - St. Louis is an aerospace manufacturer with office and manufacturing buildings adjacent to the Lambert-St. Louis International Airport in St. Louis, Missouri. Because a number of storm water outfalls lead from MDC property to Coldwater Creek, a real possibility exists for an accidental discharge of oil from MDC facilities to navigable water. Therefore, the purpose of this SPCC plan is to prevent, reduce, or eliminate pollution to the environment from MDC facilities through a program of preparedness and prevention. This is accomplished through engineered spill prevention and detection, providing material, equipment, and manpower to contain and recover an accidental spill or discharge and an employee awareness program through training. This SPCC is required by the Code of Federal Regulations, Title 40, Sub Part D, Part 112, and 40 CFR 264, Sub Part D.

B. SCOPE

1. Plant Engineering Maintenance and the Environmental Compliance Section have primary responsibility for containment and recovery of a discharge.

R-1

2. The divisional companies included in this procedure are as follows:

2.1 McDonnell Aircraft Company (MCAIR)

Lambert-St. Louis International Airport

Banshee Road

St. Louis, Missouri

D. 1. 1.5 (Continued)

every three (3) years from the date such facility becomes subject to these sections.

1.6 Section 112.6 Civil Penalties

Owners or operators of facilities subject to Section 112.3 (a), (b), (c), who violate the requirements of these sections by failing or refusing to comply with any of the provisions shall be liable for a civil penalty of not more than \$5,000 for each day that such violation continues. No penalty shall be assessed until the owner or operator has been given notice and an opportunity for hearing.

E. GENERAL

1. McDonnell Douglas Corporation - St. Louis Environmental Pollution Control Program

1.1 The Environmental Compliance section is assigned the responsibility of conducting "all liaison between MDC-St. Louis and the various regulatory bodies, including reporting spills to the National Response Center". R-1

1.2 Spills are reported to Environmental Compliance by calling 232-3319 between 8:00 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, weekends, and holidays, call the MDC telephone operator. The message will be relayed via telephone or Pocket Pager System. R-1

F. MCAIR OIL SPILL PREVENTION PLAN

1. Fuel Oil Storage - All above-ground tanks in excess of 300 gallons, except the 9,000-gallon Coaliquid fuel tank at Bldg. 5, are provided with concrete wall or diked enclosures to contain any losses. All underground tanks in excess of 500 gallons (except for emergency generator tanks at Bldg. 106 - 1,500 gal., Bldg. 107 - 4,000 gal.) are checked monthly.
Note: Coaliquid is a mixture of 50% pulverized coal, 40% No. 6 fuel oil, and 10% water. Due to its high viscosity, spill liability is low!
2. Gasoline Storage - All above-ground tanks do not have any spill containment enclosures. The maximum size tank in this service is 500 gallons. All underground tanks (except for emergency generator tank at Bldg. 2 - 1,000 gallons) are checked monthly.
3. Jet Fuel (JP-4) - All stationary tanks (non-trailers) are located underground.
4. Solvents - Bulk solvent storage is maintained in underground tanks.
5. Cutting Oils - A total of nine tanks having a total capacity of 23,000 gallons are located in Bldg. 27 "Anodize" basement. The sewer in this basement area is connected to the Bldg. 14 Industrial Waste Water Treatment Plant; therefore, no losses can escape to open streams.

G. OPERATIONAL RESPONSIBILITIES

Oil Spill Countermeasure Plan

1. Tract I - North - Dept. 892A Maintenance Superintendent Responsibility
Identification - Oil spilled into any storm sewer drainage system in Tract I - North will flow from the McDonnell property of NPDES Outfall 001. This outfall is located on the north side of McDonnell Blvd., east of the entrance to Owens-Corning Company. The McDonnell effluent comes from underneath McDonnell Blvd.

R-1

G. 1. 1.4

1.4b If it has been MORE than two hours since oil was discharged at NPDES Outfall 001, take the Oil Spill Response Trailer to the intersection of Coldwater Creek and Highway I-270 south service road (9000 Pershall Road). Install the oil-absorbing media and begin oil collecting using floating skimmer as required.

NOTE: Under normal flow conditions, oil discharged from NPDES Outfall 001 will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

2. Tract I - South - Dept. 892B Maintenance Superintendent Responsibility

R-1

Identification - Oil spilled into storm sewer drainage systems in Tract I - South will flow from the McDonnell property of NPDES Outfalls 002, 003, or 004. Outfalls 002 and 004 enter Coldwater Creek underground. Access to Outfall 003 is gained by entering the electrical substation (Bldg. 8) and then going into the Bldg. 9 pump house. Outfall 003 is the outlet of the stream flowing through the bottom of Bldg. 9. Oil-absorbing media is stored in the cabinet located in the southeast corner of Bldg. 9 on the floor level that you enter (metal grate floor) and also in a box identified as "Emergency Oil Absorbing Boom" located in Parking Lot 3.

Action - The Maintenance supervision responsible for Tract I - South will, immediately upon receiving knowledge of any oil entering the storm sewers in Tract I - South, take the following sequence of steps.

2.1 Send Maintenance personnel to the "Emergency Oil Absorbing Media" storage box located in Bldg. 9 and install one (1) 10 ft. boom across at this location.

G. 2. 2.4 2.4b (Continued)

normal flow conditions, oil discharged into Coldwater Creek at Banshee Road will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

3. Tract II - Depts. 893A and 893B Maintenance Superintendent Responsibility R-1

Identification - Oil spilled into any storm sewer drainage systems in Tract II will flow from McDonnell property at NPDES Outfalls 006, 007, 010, or 011. All of these outfalls ultimately discharge into a tributary of Coldwater Creek which flows north, parallel to Eva Avenue. The oil-absorbing media to be used for this area will be found in the Oil Spill Response Trailer located at Bldg. 14.

Action - The Maintenance supervision responsible for Tract II will, immediately upon receiving knowledge of any oil entering the storm sewer in Tract II, take the following steps.

3.1 Send Maintenance personnel to Bldg. 14, obtain the Oil Spill Response Trailer and tow the trailer to Tract II.

3.2 Determine which NPDES outfall the oil discharge is occurring and take the Oil Spill Response Trailer there. R-1

3.3 Install oil-absorbing media to prevent oil from escaping McDonnell property.

3.4 If oil has already been discharged past these NPDES outfalls, then proceed with the Oil Spill Response Trailer to the intersection of Frost Avenue and Eva Avenue. Immediately east of Eva Avenue is a "ditch" that is common to all Tract II NPDES outfalls (plus non-McDonnell flows). If the oil has not yet reached this location, install the oil-absorbing booms and begin oil collection using the floating skimmer as required.

SECTION III

MDC-ST. LOUIS PLAN

"REPORTING SPILLS OF OIL AND HAZARDOUS MATERIALS"

SCOPE:

The following plan is established for the primary purpose of monitoring, investigating, and reporting spills of oil and hazardous materials, as they affect water pollution potential of storm sewer systems. Understandably, other items of concern would also be involved, such as safety and health conditions, fire protection, insurance, and maintenance. These areas are covered by separate established procedures and plans. Consequently, reference is made to these activities only for coordination purposes.

A. Emergency Coordinator - The MDC-St. Louis Emergency Coordinator is the Section Manager, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 233-9824]. The coordinator has the overall responsibility for ensuring the performance of the activities specified in the "SCOPE." The alternate MDC-St. Louis Emergency Coordinator is the Waste Removal Coordinator, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 232-3319]. See Attachment III for a current list of names and home phone numbers of personnel filling these positions. R-1

B. Surveillance and Monitoring Activities:

1. Functional Operations - Environmental Compliance is directly responsible for functional operations. Environmental engineers and inspectors within this group periodically inspect operations and monitor potential upset conditions through a regular routine of sample collection and analysis. R-1

D. Internal Notification Procedures - The following MDC-St. Louis personnel will be notified as required for coordination purposes and/or possible corrective action, depending upon the nature of the upset condition.

	<u>Telephone Number</u> <u>(Normal Work Hours)</u>	
1. Crisis Management Coordinator Executive Officer Command Section U.S. Navy	Sta. 22731	
2. NAVPRO, CNO Sub-Area Coordinator Representative U.S. Navy	Sta. 22875	
3. Chief Property Management Branch U.S. Navy	Sta. 22459	
4. Safety Engineer U.S. Navy	Sta. 23444	
5. Manager, Dept. 064 Occupational Safety and Medical Services	Sta. 30436	R-1
6. Director, Dept. 890 Plant Engineering	Sta. 47058	R-1
7. Manager, Dept. 890 Plant Design and Maintenance Engineering	Sta. 22379	R-1

R-1

R-1

NOTE: See Attachment III for a current list of names and home phone numbers of the personnel filling these positions.

ATTACHMENT II

INTERNAL POLLUTION UPSET REPORTING PROCEDURE

(INSTRUCTIONS TO MDC-ST. LOUIS TELEPHONE OPERATORS)

1. In order to satisfy the requirements of the U.S. Department of Defense, MCAIR Management and the United States Environmental Protection Agency, we have instituted the following reporting system.
2. McDonnell telephone operators will continue to receive "Pollution Upset" reports between 4:30 p.m. and 8:00 a.m., Monday through Friday and during all shifts on Saturdays, Sundays, and holidays. Whenever a telephone operator receives a "Pollution Upset" report, the operator shall contact Environmental Compliance via the pocket pager. The pocket pager will be rotated among the Environmental Compliance staff. Whoever has the pocket pager should respond. The MDC telephone operator shall then wait 30 minutes. If no one responds to the pocket pager, begin calling the following personnel in sequence, starting at the top of the list, until you are able to reach one of them. If you are unable to reach anyone, wait 30 minutes and start the sequence over again, starting with the pocket pager. If no one has been contacted by the end of the shift, instruct the next shift to continue calling until contact is made.

R-1

R-1

J. C. Patterson Home Phone - 567-1336
P.E. Duty Officer (Weekends and Holidays only)

R-1

R. E. Bishop Home Phone - 389-0467
E. M. Myers Home Phone - 432-2107

R-1

R-1

3. The telephone operators shall record the "Pollution Upset" report in writing and orally relay them to the individual they are successful in contacting.

ATTACHMENT III

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off-Duty Telephone No.</u>	
1.	MDC-St. Louis Emergency Coordinator Dept. 891C	J. C. Patterson	(314) 567-1336	R-1
2.	Alternate MDC-St. Louis Emergency Coordinator Dept. 891C	R. J. Linzmaier	(314) 447-3080	R-1
3.	Crisis Management Coordinator Executive Officer Command Section	*W. H. Goesling (AA)	*(314) 232-0232 Ask to speak to "Air Force Duty Officer"	
4.	Safety Engineer	*J. Q. Harbison (SE)	"	
5.	NAVPRO CNO Sub-Area Coordinator Representative	*D. T. Smith (IN)	"	
6.	Chief Property Management Branch	*J. H. White (INX)	"	
7.	Manager, Dept. 064 Occupational Safety and Medical Services	R. L. Kuhn	None at this time	R-1
8.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1
9.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1

R-1

R-1

2. (G-2) Emergency Coordinators

* (314) 233-9824 - Section Manager, Environmental Compliance R-1
(Primary Coordinator)

R-1

* (314) 232-2370 - Manager, Plant Design and Maintenance Engineering

* (314) 234-7058 - Director, Plant Engineering R-1

(314) 232-2821 - Plant Engineering Duty Officer

(314) 232-2821 - Corporate Duty Officer

Note: See Attachment I for corresponding names and home
phone numbers.

(* = 8:00 a.m. to 4:30 p.m. normal work days)

(# = All other times)

3. Emergency Equipment

MDC-St. Louis has its own Fire Services, which consists of at least eight firemen and one officer on duty at any given time. Fire Services equipment consists of: four Class A structural pumpers; two crash trucks with 2,000 gallons of water and 110 gallons of foam; two trucks with 1,000 lbs. of dry chemicals on each unit; one utility van; one car; two pickup trucks; and a trailer with 20 bags of oil-absorbent material. MDC-St. Louis has a "Pre-Fire Plan" (see Figure F-2 Section F) that defines the specifics of what is stored at this facility, where fire hydrants are located, what action is to be taken by firemen and guards in the event of a fire, and what backup community fire departments are to be called if necessary.

ATTACHMENT I
EMERGENCY COORDINATORS

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off Duty Telephone No.</u>	
1.	Section Manager, Dept. 891C Environmental Compliance	J. C. Patterson	(314) 567-1336	R-1
				R-1
2.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1
3.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1

6. Environmental Compliance

Environmental Compliance, a section of Plant Engineering, implements R-2
environmental procedures at the plant. In the event of a pollution emergency,
a representative of this group monitors the emergency site and provides
assistance and direction for controlling the emergency and cleaning up the
area. Environmental Compliance is also responsible for notifying the National R-2
Response Center (800-424-8802) if the situation requires such action.

7. Duties of Emergency Coordinator

In the event of a pollution emergency, the first person discovering the
emergency shall notify the Fire Services at inplant telephone number 22611 and
the Guard Services Headquarters at inplant telephone number 22821. They will
in turn notify an emergency coordinator, starting at the top of the list and
working down. The first person contacted shall be the emergency coordinator
for that particular situation and shall act as an "on-site coordinator" and
shall remain there until the situation is over. Evacuating and cordoning
the area is the responsibility of Security Services. The MDC-St. Louis Fire
Chief shall decide if assistance is required from a local fire department.

E. (G-3) Implementation of the Contingency Plan

1. The decision to implement the contingency plan depends upon whether or not
an imminent or actual incident could threaten human health or the environment.
The purpose of this section is to provide guidance to the emergency coordinator
in making this decision by providing decision-making criteria.

4. Possible sources of ignition have been eliminated in areas where flammable materials are stored. Vehicular traffic in the area will be controlled until the spill is contained and safety is restored. If spilled materials are flammable, the Fire Services will respond with foam equipment and hoses. Flushing with large quantities of water or foaming of the spill will be performed only if advised by a Fire Services officer.
5. If a highly flammable material is released (e.g. propane or natural gas), a decision, based on volume, immediate danger, and impending explosion, will be made concerning notifying or evacuating personnel in the surrounding area. Use of motor vehicles within this area will be restricted or eliminated to avoid ignition of the vapor, which can cause a flashback to the source and an initial explosion of fire of wide dimensions.
6. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The Fire Services officer will determine when the emergency has passed and consult with the emergency coordinator before the "all clear" signal is given.

H. Spills or Material Release

1. In the event of a major emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation. If the spill is a flammable material, notify the Fire Services. Report all other spills to Environmental Compliance, Phone 23319, between 8 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, Monday through Friday, and all shifts Saturday, Sunday, and holidays, phone the MDC-St. Louis Telephone Operator and report the nature of the emergency.

R-1

SECTION II
INSOLUBLE (FLOATING) MATERIAL

A. PURPOSE

McDonnell Douglas Corporation - St. Louis is an aerospace manufacturer with office and manufacturing buildings adjacent to the Lambert-St. Louis International Airport in St. Louis, Missouri. Because a number of storm water outfalls lead from MDC property to Coldwater Creek, a real possibility exists for an accidental discharge of oil from MDC facilities to navigable water. Therefore, the purpose of this SPCC plan is to prevent, reduce, or eliminate pollution to the environment from MDC facilities through a program of preparedness and prevention. This is accomplished through engineered spill prevention and detection, providing material, equipment, and manpower to contain and recover an accidental spill or discharge and an employee awareness program through training. This SPCC is required by the Code of Federal Regulations, Title 40, Sub Part D, Part 112, and 40 CFR 264, Sub Part D.

B. SCOPE

1. Plant Engineering Maintenance and the Environmental Compliance Section have primary responsibility for containment and recovery of a discharge.

R-1

2. The divisional companies included in this procedure are as follows:

2.1 McDonnell Aircraft Company (MCAIR)

Lambert-St. Louis International Airport

Banshee Road

St. Louis, Missouri

D. 1. 1.5 (Continued)

every three (3) years from the date such facility becomes subject to these sections.

1.6 Section 112.6 Civil Penalties

Owners or operators of facilities subject to Section 112.3 (a), (b), (c), who violate the requirements of these sections by failing or refusing to comply with any of the provisions shall be liable for a civil penalty of not more than \$5,000 for each day that such violation continues. No penalty shall be assessed until the owner or operator has been given notice and an opportunity for hearing.

E. GENERAL

1. McDonnell Douglas Corporation - St. Louis Environmental Pollution Control Program

1.1 The Environmental Compliance section is assigned the responsibility of conducting "all liaison between MDC-St. Louis and the various regulatory bodies, including reporting spills to the National Response Center". R-1

1.2 Spills are reported to Environmental Compliance by calling 232-3319 between 8:00 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, weekends, and holidays, call the MDC telephone operator. The message will be relayed via telephone or Pocket Pager System. R-1

F. MCAIR OIL SPILL PREVENTION PLAN

1. Fuel Oil Storage - All above-ground tanks in excess of 300 gallons, except the 9,000-gallon Coaliquid fuel tank at Bldg. 5, are provided with concrete wall or diked enclosures to contain any losses. All underground tanks in excess of 500 gallons (except for emergency generator tanks at Bldg. 106 - 1,500 gal., Bldg. 107 - 4,000 gal.) are checked monthly.
Note: Coaliquid is a mixture of 50% pulverized coal, 40% No. 6 fuel oil, and 10% water. Due to its high viscosity, spill liability is low!
2. Gasoline Storage - All above-ground tanks do not have any spill containment enclosures. The maximum size tank in this service is 500 gallons. All underground tanks (except for emergency generator tank at Bldg. 2 - 1,000 gallons) are checked monthly.
3. Jet Fuel (JP-4) - All stationary tanks (non-trailers) are located underground.
4. Solvents - Bulk solvent storage is maintained in underground tanks.
5. Cutting Oils - A total of nine tanks having a total capacity of 23,000 gallons are located in Bldg. 27 "Anodize" basement. The sewer in this basement area is connected to the Bldg. 14 Industrial Waste Water Treatment Plant; therefore, no losses can escape to open streams.

G. OPERATIONAL RESPONSIBILITIES

Oil Spill Countermeasure Plan

1. Tract I - North - Dept. 892A Maintenance Superintendent Responsibility R-1
Identification - Oil spilled into any storm sewer drainage system in Tract I - North will flow from the McDonnell property of NPDES Outfall 001. This outfall is located on the north side of McDonnell Blvd., east of the entrance to Owens-Corning Company. The McDonnell effluent comes from underneath McDonnell Blvd.

G. 1. 1.4

1.4b If it has been MORE than two hours since oil was discharged at NPDES Outfall 001, take the Oil Spill Response Trailer to the intersection of Coldwater Creek and Highway I-270 south service road (9000 Pershall Road). Install the oil-absorbing media and begin oil collecting using floating skimmer as required.

NOTE: Under normal flow conditions, oil discharged from NPDES Outfall 001 will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

2. Tract I - South - Dept. 892B Maintenance Superintendent Responsibility

R-1

Identification - Oil spilled into storm sewer drainage systems in Tract I - South will flow from the McDonnell property of NPDES Outfalls 002, 003, or 004. Outfalls 002 and 004 enter Coldwater Creek underground. Access to Outfall 003 is gained by entering the electrical substation (Bldg. 8) and then going into the Bldg. 9 pump house. Outfall 003 is the outlet of the stream flowing through the bottom of Bldg. 9. Oil-absorbing media is stored in the cabinet located in the southeast corner of Bldg. 9 on the floor level that you enter (metal grate floor) and also in a box identified as "Emergency Oil Absorbing Boom" located in Parking Lot 3.

Action - The Maintenance supervision responsible for Tract I - South will, immediately upon receiving knowledge of any oil entering the storm sewers in Tract I - South, take the following sequence of steps.

2.1 Send Maintenance personnel to the "Emergency Oil Absorbing Media" storage box located in Bldg. 9 and install one (1) 10 ft. boom across at this location.

G. 2. 2.4 2.4b (Continued)

normal flow conditions, oil discharged into Coldwater Creek at Banshee Road will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

3. Tract II - Depts. 893A and 893B Maintenance Superintendent Responsibility R-1

Identification - Oil spilled into any storm sewer drainage systems in Tract II will flow from McDonnell property at NPDES Outfalls 006, 007, 010, or 011. All of these outfalls ultimately discharge into a tributary of Coldwater Creek which flows north, parallel to Eva Avenue. The oil-absorbing media to be used for this area will be found in the Oil Spill Response Trailer located at Bldg. 14.

Action - The Maintenance supervision responsible for Tract II will, immediately upon receiving knowledge of any oil entering the storm sewer in Tract II, take the following steps.

- 3.1 Send Maintenance personnel to Bldg. 14, obtain the Oil Spill Response Trailer and tow the trailer to Tract II.
- 3.2 Determine which NPDES outfall the oil discharge is occurring and take the Oil Spill Response Trailer there. R-1
- 3.3 Install oil-absorbing media to prevent oil from escaping McDonnell property.
- 3.4 If oil has already been discharged past these NPDES outfalls, then proceed with the Oil Spill Response Trailer to the intersection of Frost Avenue and Eva Avenue. Immediately east of Eva Avenue is a "ditch" that is common to all Tract II NPDES outfalls (plus non-McDonnell flows). If the oil has not yet reached this location, install the oil-absorbing booms and begin oil collection using the floating skimmer as required.

SECTION III

MDC-ST. LOUIS PLAN

"REPORTING SPILLS OF OIL AND HAZARDOUS MATERIALS"

SCOPE:

The following plan is established for the primary purpose of monitoring, investigating, and reporting spills of oil and hazardous materials, as they affect water pollution potential of storm sewer systems. Understandably, other items of concern would also be involved, such as safety and health conditions, fire protection, insurance, and maintenance. These areas are covered by separate established procedures and plans. Consequently, reference is made to these activities only for coordination purposes.

A. Emergency Coordinator - The MDC-St. Louis Emergency Coordinator is the Section Manager, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 233-9824]. The coordinator has the overall responsibility for ensuring the performance of the activities specified in the "SCOPE." The alternate MDC-St. Louis Emergency Coordinator is the Waste Removal Coordinator, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 232-3319]. See Attachment III for a current list of names and home phone numbers of personnel filling these positions. R-1

B. Surveillance and Monitoring Activities:

1. Functional Operations - Environmental Compliance is directly responsible for functional operations. Environmental engineers and inspectors within this group periodically inspect operations and monitor potential upset conditions through a regular routine of sample collection and analysis. R-1

D. Internal Notification Procedures - The following MDC-St. Louis personnel will be notified as required for coordination purposes and/or possible corrective action, depending upon the nature of the upset condition.

	Telephone Number (Normal Work Hours)	
1. Crisis Management Coordinator Executive Officer Command Section U.S. Navy	Sta. 22731	
2. NAVPRO, CNO Sub-Area Coordinator Representative U.S. Navy	Sta. 22875	
3. Chief Property Management Branch U.S. Navy	Sta. 22459	
4. Safety Engineer U.S. Navy	Sta. 23444	
5. Manager, Dept. 064 Occupational Safety and Medical Services	Sta. 30436	R-1
6. Director, Dept. 890 Plant Engineering	Sta. 47058	R-1
7. Manager, Dept. 890 Plant Design and Maintenance Engineering	Sta. 22379	R-1
		R-1
		R-1

NOTE: See Attachment III for a current list of names and home phone numbers of the personnel filling these positions.

ATTACHMENT II

INTERNAL POLLUTION UPSET REPORTING PROCEDURE

(INSTRUCTIONS TO MDC-ST. LOUIS TELEPHONE OPERATORS)

1. In order to satisfy the requirements of the U.S. Department of Defense, MCAIR Management and the United States Environmental Protection Agency, we have instituted the following reporting system.
2. McDonnell telephone operators will continue to receive "Pollution Upset" reports between 4:30 p.m. and 8:00 a.m., Monday through Friday and during all shifts on Saturdays, Sundays, and holidays. Whenever a telephone operator receives a "Pollution Upset" report, the operator shall contact Environmental Compliance via the pocket pager. The pocket pager will be rotated among the Environmental Compliance staff. Whoever has the pocket pager should respond. The MDC telephone operator shall then wait 30 minutes. If no one responds to the pocket pager, begin calling the following personnel in sequence, starting at the top of the list, until you are able to reach one of them. If you are unable to reach anyone, wait 30 minutes and start the sequence over again, starting with the pocket pager. If no one has been contacted by the end of the shift, instruct the next shift to continue calling until contact is made.

J. C. Patterson Home Phone - 567-1336
P.E. Duty Officer (Weekends and Holidays only)

R. E. Bishop Home Phone - 389-0467
E. M. Myers Home Phone - 432-2107

3. The telephone operators shall record the "Pollution Upset" report in writing and orally relay them to the individual they are successful in contacting.

ATTACHMENT III

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off-Duty Telephone No.</u>	
1.	MDC-St. Louis Emergency Coordinator Dept. 891C	J. C. Patterson	(314) 567-1336	R-1
2.	Alternate MDC-St. Louis Emergency Coordinator Dept. 891C	R. J. Linzmaier	(314) 447-3080	R-1
3.	Crisis Management Coordinator Executive Officer Command Section	*W. H. Goesling (AA)	*(314) 232-0232 Ask to speak to "Air Force Duty Officer"	
4.	Safety Engineer	*J. Q. Harbison (SE)	"	
5.	NAVPRO CNO Sub-Area Coordinator Representative	*D. T. Smith (IN)	"	
6.	Chief Property Management Branch	*J. H. White (INX)	"	
7.	Manager, Dept. 064 Occupational Safety and Medical Services	R. L. Kuhn	None at this time	R-1
8.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1
9.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1

R-1

R-1

2. (G-2) Emergency Coordinators

* (314) 233-9824 - Section Manager, Environmental Compliance R-1
(Primary Coordinator)

R-1

* (314) 232-2370 - Manager, Plant Design and Maintenance Engineering

* (314) 234-7058 - Director, Plant Engineering R-1

(314) 232-2821 - Plant Engineering Duty Officer

(314) 232-2821 - Corporate Duty Officer

Note: See Attachment I for corresponding names and home
phone numbers.

(* = 8:00 a.m. to 4:30 p.m. normal work days)

(# = All other times)

3. Emergency Equipment

MDC-St. Louis has its own Fire Services, which consists of at least eight firemen and one officer on duty at any given time. Fire Services equipment consists of: four Class A structural pumpers; two crash trucks with 2,000 gallons of water and 110 gallons of foam; two trucks with 1,000 lbs. of dry chemicals on each unit; one utility van; one car; two pickup trucks; and a trailer with 20 bags of oil-absorbent material. MDC-St. Louis has a "Pre-Fire Plan" (see Figure F-2 Section F) that defines the specifics of what is stored at this facility, where fire hydrants are located, what action is to be taken by firemen and guards in the event of a fire, and what backup community fire departments are to be called if necessary.

ATTACHMENT I
EMERGENCY COORDINATORS

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off Duty Telephone No.</u>	
1.	Section Manager, Dept. 891C Environmental Compliance	J. C. Patterson	(314) 567-1336	R-1
				R-1
2.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1
3.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1

6. Environmental Compliance

Environmental Compliance, a section of Plant Engineering, implements R-2
environmental procedures at the plant. In the event of a pollution emergency,
a representative of this group monitors the emergency site and provides
assistance and direction for controlling the emergency and cleaning up the
area. Environmental Compliance is also responsible for notifying the National R-2
Response Center (800-424-8802) if the situation requires such action.

7. Duties of Emergency Coordinator

In the event of a pollution emergency, the first person discovering the
emergency shall notify the Fire Services at inplant telephone number 22611 and
the Guard Services Headquarters at inplant telephone number 22821. They will
in turn notify an emergency coordinator, starting at the top of the list and
working down. The first person contacted shall be the emergency coordinator
for that particular situation and shall act as an "on-site coordinator" and
shall remain there until the situation is over. Evacuating and cordoning
the area is the responsibility of Security Services. The MDC-St. Louis Fire
Chief shall decide if assistance is required from a local fire department.

E. (G-3) Implementation of the Contingency Plan

1. The decision to implement the contingency plan depends upon whether or not
an imminent or actual incident could threaten human health or the environment.
The purpose of this section is to provide guidance to the emergency coordinator
in making this decision by providing decision-making criteria.

4. Possible sources of ignition have been eliminated in areas where flammable materials are stored. Vehicular traffic in the area will be controlled until the spill is contained and safety is restored. If spilled materials are flammable, the Fire Services will respond with foam equipment and hoses. Flushing with large quantities of water or foaming of the spill will be performed only if advised by a Fire Services officer.
5. If a highly flammable material is released (e.g. propane or natural gas), a decision, based on volume, immediate danger, and impending explosion, will be made concerning notifying or evacuating personnel in the surrounding area. Use of motor vehicles within this area will be restricted or eliminated to avoid ignition of the vapor, which can cause a flashback to the source and an initial explosion of fire of wide dimensions.
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1. In the event of a major emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation. If the spill is a flammable material, notify the Fire Services. Report all other spills to Environmental Compliance, Phone 23319, between 8 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, Monday through Friday, and all shifts Saturday, Sunday, and holidays, phone the MDC-St. Louis Telephone Operator and report the nature of the emergency.

R-1

SECTION II
INSOLUBLE (FLOATING) MATERIAL

A. PURPOSE

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B. SCOPE

1. Plant Engineering Maintenance and the Environmental Compliance Section R-1
have primary responsibility for containment and recovery of a discharge.

2. The divisional companies included in this procedure are as follows:

2.1 McDonnell Aircraft Company (MCAIR)

Lambert-St. Louis International Airport

Banshee Road

St. Louis, Missouri

D. 1. 1.5 (Continued)

every three (3) years from the date such facility becomes subject to these sections.

1.6 Section 112.6 Civil Penalties

Owners or operators of facilities subject to Section 112.3 (a), (b), (c), who violate the requirements of these sections by failing or refusing to comply with any of the provisions shall be liable for a civil penalty of not more than \$5,000 for each day that such violation continues. No penalty shall be assessed until the owner or operator has been given notice and an opportunity for hearing.

E. GENERAL

1. McDonnell Douglas Corporation - St. Louis Environmental Pollution Control Program

- 1.1 The Environmental Compliance section is assigned the responsibility of conducting "all liaison between MDC-St. Louis and the various regulatory bodies, including reporting spills to the National Response Center". R-1
- 1.2 Spills are reported to Environmental Compliance by calling 232-3319 between 8:00 a.m. and 4:30 p.m. Monday through Friday. On second and third shifts, weekends, and holidays, call the MDC telephone operator. The message will be relayed via telephone or Pocket Pager System. R-1

F. MCAIR OIL SPILL PREVENTION PLAN

1. Fuel Oil Storage - All above-ground tanks in excess of 300 gallons, except the 9,000-gallon Coaliquid fuel tank at Bldg. 5, are provided with concrete wall or diked enclosures to contain any losses. All underground tanks in excess of 500 gallons (except for emergency generator tanks at Bldg. 106 - 1,500 gal., Bldg. 107 - 4,000 gal.) are checked monthly.
Note: Coaliquid is a mixture of 50% pulverized coal, 40% No. 6 fuel oil, and 10% water. Due to its high viscosity, spill liability is low!
2. Gasoline Storage - All above-ground tanks do not have any spill containment enclosures. The maximum size tank in this service is 500 gallons. All underground tanks (except for emergency generator tank at Bldg. 2 - 1,000 gallons) are checked monthly.
3. Jet Fuel (JP-4) - All stationary tanks (non-trailers) are located underground.
4. Solvents - Bulk solvent storage is maintained in underground tanks.
5. Cutting Oils - A total of nine tanks having a total capacity of 23,000 gallons are located in Bldg. 27 "Anodize" basement. The sewer in this basement area is connected to the Bldg. 14 Industrial Waste Water Treatment Plant; therefore, no losses can escape to open streams.

G. OPERATIONAL RESPONSIBILITIES

Oil Spill Countermeasure Plan

1. Tract I - North - Dept. 892A Maintenance Superintendent Responsibility R-1
Identification - Oil spilled into any storm sewer drainage system in Tract I - North will flow from the McDonnell property of NPDES Outfall 001. This outfall is located on the north side of McDonnell Blvd., east of the entrance to Owens-Corning Company. The McDonnell effluent comes from underneath McDonnell Blvd.

G. 1. 1.4

1.4b If it has been MORE than two hours since oil was discharged at NPDES Outfall 001, take the Oil Spill Response Trailer to the intersection of Coldwater Creek and Highway I-270 south service road (9000 Pershall Road). Install the oil-absorbing media and begin oil collecting using floating skimmer as required.

NOTE: Under normal flow conditions, oil discharged from NPDES Outfall 001 will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

2. Tract I - South - Dept. 892B Maintenance Superintendent Responsibility

R-1

Identification - Oil spilled into storm sewer drainage systems in Tract I - South will flow from the McDonnell property of NPDES Outfalls 002, 003, or 004. Outfalls 002 and 004 enter Coldwater Creek underground. Access to Outfall 003 is gained by entering the electrical substation (Bldg. 8) and then going into the Bldg. 9 pump house. Outfall 003 is the outlet of the stream flowing through the bottom of Bldg. 9. Oil-absorbing media is stored in the cabinet located in the southeast corner of Bldg. 9 on the floor level that you enter (metal grate floor) and also in a box identified as "Emergency Oil Absorbing Boom" located in Parking Lot 3.

Action - The Maintenance supervision responsible for Tract I - South will, immediately upon receiving knowledge of any oil entering the storm sewers in Tract I - South, take the following sequence of steps.

2.1 Send Maintenance personnel to the "Emergency Oil Absorbing Media" storage box located in Bldg. 9 and install one (1) 10 ft. boom across at this location.

G. 2. 2.4 2.4b (Continued)

normal flow conditions, oil discharged into Coldwater Creek at Banshee Road will require six (6) or more hours to reach Coldwater Creek and Pershall Road.

3. Tract II - Depts. 893A and 893B Maintenance Superintendent Responsibility R-1

Identification - Oil spilled into any storm sewer drainage systems in Tract II will flow from McDonnell property at NPDES Outfalls 006, 007, 010, or 011. All of these outfalls ultimately discharge into a tributary of Coldwater Creek which flows north, parallel to Eva Avenue. The oil-absorbing media to be used for this area will be found in the Oil Spill Response Trailer located at Bldg. 14.

Action - The Maintenance supervision responsible for Tract II will, immediately upon receiving knowledge of any oil entering the storm sewer in Tract II, take the following steps.

3.1 Send Maintenance personnel to Bldg. 14, obtain the Oil Spill Response Trailer and tow the trailer to Tract II.

3.2 Determine which NPDES outfall the oil discharge is occurring and take the Oil Spill Response Trailer there. R-1

3.3 Install oil-absorbing media to prevent oil from escaping McDonnell property.

3.4 If oil has already been discharged past these NPDES outfalls, then proceed with the Oil Spill Response Trailer to the intersection of Frost Avenue and Eva Avenue. Immediately east of Eva Avenue is a "ditch" that is common to all Tract II NPDES outfalls (plus non-McDonnell flows). If the oil has not yet reached this location, install the oil-absorbing booms and begin oil collection using the floating skimmer as required.

SECTION III

MDC-ST. LOUIS PLAN

"REPORTING SPILLS OF OIL AND HAZARDOUS MATERIALS"

SCOPE:

The following plan is established for the primary purpose of monitoring, investigating, and reporting spills of oil and hazardous materials, as they affect water pollution potential of storm sewer systems. Understandably, other items of concern would also be involved, such as safety and health conditions, fire protection, insurance, and maintenance. These areas are covered by separate established procedures and plans. Consequently, reference is made to these activities only for coordination purposes.

- A. Emergency Coordinator - The MDC-St. Louis Emergency Coordinator is the Section Manager, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 233-9824]. The coordinator has the overall responsibility for ensuring the performance of the activities specified in the "SCOPE." The alternate MDC-St. Louis Emergency Coordinator is the Waste Removal Coordinator, Environmental Compliance, Dept. 891C, McDonnell Aircraft Company [telephone (314) 232-3319]. See Attachment III for a current list of names and home phone numbers of personnel filling these positions. R-1
- B. Surveillance and Monitoring Activities:
1. Functional Operations - Environmental Compliance is directly responsible for functional operations. Environmental engineers and inspectors within this group periodically inspect operations and monitor potential upset conditions through a regular routine of sample collection and analysis. R-1

D. Internal Notification Procedures - The following MDC-St. Louis personnel will be notified as required for coordination purposes and/or possible corrective action, depending upon the nature of the upset condition.

	<u>Telephone Number</u> <u>(Normal Work Hours)</u>	
1. Crisis Management Coordinator Executive Officer Command Section U.S. Navy	Sta. 22731	
2. NAVPRO, CNO Sub-Area Coordinator Representative U.S. Navy	Sta. 22875	
3. Chief Property Management Branch U.S. Navy	Sta. 22459	
4. Safety Engineer U.S. Navy	Sta. 23444	
5. Manager, Dept. 064 Occupational Safety and Medical Services	Sta. 30436	R-1
6. Director, Dept. 890 Plant Engineering	Sta. 47058	R-1
7. Manager, Dept. 890 Plant Design and Maintenance Engineering	Sta. 22379	R-1
		R-1
		R-1

NOTE: See Attachment III for a current list of names and home phone numbers of the personnel filling these positions.

ATTACHMENT II

INTERNAL POLLUTION UPSET REPORTING PROCEDURE

(INSTRUCTIONS TO MDC-ST. LOUIS TELEPHONE OPERATORS)

1. In order to satisfy the requirements of the U.S. Department of Defense, MCAIR Management and the United States Environmental Protection Agency, we have instituted the following reporting system.
2. McDonnell telephone operators will continue to receive "Pollution Upset" reports between 4:30 p.m. and 8:00 a.m., Monday through Friday and during all shifts on Saturdays, Sundays, and holidays. Whenever a telephone operator receives a "Pollution Upset" report, the operator shall contact Environmental Compliance via the pocket pager. The pocket pager will be rotated among the Environmental Compliance staff. Whoever has the pocket pager should respond. The MDC telephone operator shall then wait 30 minutes. If no one responds to the pocket pager, begin calling the following personnel in sequence, starting at the top of the list, until you are able to reach one of them. If you are unable to reach anyone, wait 30 minutes and start the sequence over again, starting with the pocket pager. If no one has been contacted by the end of the shift, instruct the next shift to continue calling until contact is made.

J. C. Patterson Home Phone - 567-1336

P.E. Duty Officer (Weekends and Holidays only)

R. E. Bishop Home Phone - 389-0467

E. M. Myers Home Phone - 432-2107

3. The telephone operators shall record the "Pollution Upset" report in writing and orally relay them to the individual they are successful in contacting.

ATTACHMENT III

The following is a tabulation of titles and the personnel filling these positions at this time. Telephone numbers have been provided for use during "off duty" hours.

	<u>Title</u>	<u>Name</u>	<u>Off-Duty Telephone No.</u>	
1.	MDC-St. Louis Emergency Coordinator Dept. 891C	J. C. Patterson	(314) 567-1336	R-1
2.	Alternate MDC-St. Louis Emergency Coordinator Dept. 891C	R. J. Linzmaier	(314) 447-3080	R-1
3.	Crisis Management Coordinator Executive Officer Command Section	*W. H. Goesling (AA)	*(314) 232-0232 Ask to speak to "Air Force Duty Officer"	
4.	Safety Engineer	*J. Q. Harbison (SE)	"	
5.	NAVPRO CNO Sub-Area Coordinator Representative	*D. T. Smith (IN)	"	
6.	Chief Property Management Branch	*J. H. White (INX)	"	
7.	Manager, Dept. 064 Occupational Safety and Medical Services	R. L. Kuhn	None at this time	R-1
8.	Director, Dept. 890 Plant Engineering	E. M. Myers	(314) 432-2107	R-1
9.	Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop	(314) 389-0467	R-1

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